

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
COLUMBIA DIVISION

FILED
U.S. DISTRICT COURT
MIDDLE DISTRICT OF TENN.
NOV 06 2013
BY *Res*
DEPUTY CLERK

UNITED STATES OF AMERICA

v.

TIMOTHY STAFFORD

NO. 3:13-00221

18 U.S.C. § 241

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES:

INTRODUCTION

At all times relevant to this information:

1. The victim family, consisting of a Caucasian mother, an African-American father, and one mixed-race child, resided in Minor Hill, Tennessee.
2. The defendant is a Caucasian male who resided in Minor Hill, Tennessee.

COUNT I

3. On or about April 30, 2012, in the Middle District of Tennessee, defendant **TIMOTHY STAFFORD** knowingly and willfully combined, conspired, and agreed with other persons known to the government to injure, oppress, threaten and intimidate the victim family in the free exercise and enjoyment of a right secured to them by the laws and Constitution of the United States; that is, the right to occupy a dwelling without injury, intimidation or interference because of their race.

OBJECT OF THE CONSPIRACY

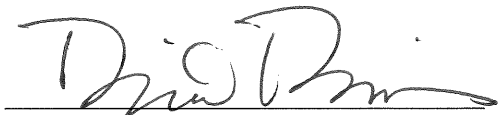
4. It was the plan and purpose of this conspiracy to build a cross and burn it in front of the victim family home in order to intimidate the family in the exercise of their housing rights because of the race of the victim family.

OVERT ACTS

5. In furtherance of the conspiracy, and to accomplish the objects thereof, defendant **TIMOTHY STAFFORD**, along with co-conspirators known to the government, committed various overt acts on or about April 30, 2012, in the Middle District of Tennessee, including, but not limited to the following:

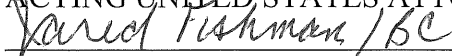
- a. Defendant **STAFFORD** and his co-conspirators discussed plans to burn a cross.
- b. Defendant **STAFFORD** built a cross.
- c. Defendant **STAFFORD** and his co-conspirators obtained gasoline to use as an accelerant to burn the cross.
- d. Defendant **STAFFORD** and his co-conspirators wrapped the cross in cloth and soaked the cloth in accelerant.
- e. Defendant **STAFFORD** and his co-conspirators transported the cross to the victim's driveway in Defendant **STAFFORD**'s truck.
- f. Defendant **STAFFORD** watched while his co-conspirators carried the cross to the victim driveway in the early morning hours and lit the cross on fire.

All in violation of Title 18, United States Code, Section 241.



DAVID RIVERA

ACTING UNITED STATES ATTORNEY



JARED FISHMAN

TRIAL ATTORNEY, DEPARTMENT OF JUSTICE



BLANCHE B. COOK

ASSISTANT UNITED STATES ATTORNEY